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April 1, 2025

**VIA ECF**

Hon. Ronnie Abrams, U.S.D.J.  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 1506  
New York, New York 10007

**Re: Trustees of the Building Service 32BJ Health Fund, et al. v. Vanguard  
General Services Corporation, et al.  
Civil Action No. 24-cv-7753 (RA)**

Dear Judge Abrams:

Our firm is counsel for the respective Plaintiffs (the "Funds") in this matter. Presently, the Funds' deadline to file their anticipated Motion for Default Judgment is April 2, 2025. The Funds ask that this deadline be extended one week, to April 9, 2025. This is the first such request for a postponement.

The Funds' anticipated Motion papers are nearly complete. However, this afternoon, the undersigned learned that, recently, Defendant Vanguard General Services Corporation contacted the Funds' auditing firm and produced the outstanding audit documents, at least in part. This production necessitates that the Funds revise the motion papers to seek the audit findings that can be determined based on the records provided to date. The Amended Complaint seeks, in part, the audit documents and, upon delivery, payment of the audit findings. Given this change, the Funds seek a short extension to amend the motion papers accordingly.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact me.

Application granted.

SO ORDERED.



Hon. Ronnie Abrams  
April 2, 2025

Respectfully submitted,



Samuel R. Bloom